

MEMO ENDORSED.**VIA ECF**

June 6, 2025

Hon. Ona T. Wang
Southern District of New York

RE: *In re OpenAI Copyright Litigation*, 25-md-3143 (SHS) (OTW)

Dear Magistrate Judge Wang:

The Plaintiffs and OpenAI Defendants in the above referenced MDL have reached agreement on a Training Data Inspection Protocol (the “Protocol”) in the form attached hereto as Exhibit A. The parties will promptly submit a finalized Protocol to the Court upon entry of a Protective Order, and in the meantime agree to be bound by the Protocol.

The parties agree that other Plaintiffs in the MDL should be granted access to the “cc-en-colang-v2-20220131-metadata” training dataset on conditions materially similar to those described in the Joint Stipulation Re: Security Protocol for Production of Training Dataset in *In Re OpenAI ChatGPT Litigation*, Case No. 23-cv-03223 Dkt. 325 (the “Security Protocol”). The parties agree to meet and confer in good faith about the technical requirements of modifying or supplementing the Security Protocol to implement this agreement. This agreement relates to “cc-en-colang-v2-20220131-metadata” and does not modify or supersede section 10 of the Security Protocol. The parties agree to meet and confer in good faith to discuss the production and export of additional datasets pursuant to the Security Protocol.

June 6, 2025

Respectfully submitted,

/s/ Justin Nelson
Justin Nelson
Susman Godfrey L.L.P.
On behalf of Class Plaintiffs

/s/ Jennifer Maisel
Jennifer Maisel
Rothwell, Figg, Ernst & Manbeck P.C.
On behalf of News Plaintiffs

/s/ Thomas Gorman
Thomas Gorman
Keker, Van Nest & Peters LLP
On behalf of OpenAI

SO ORDERED.



Ona T. Wang
U.S.M.J. 6/12/2025